

Exhibit T

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF KENNETH A. SUMMERS

COMES NOW the declarant, KENNETH A. SUMMERS, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

1. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

2. On September 11, 2001, I was employed at Empire BlueCross BlueShield, located on the 27th floor of Tower One. When the terrorist attacks occurred, I was in the lobby of Tower One. I was on my way to the post office and as I stepped out of the elevator into the lobby, I heard a boom, which I later realized was the plane hitting the building.

3. I exited the west side of the building and saw that people were running. One person told me to look up and I saw smoke coming out of Tower One and debris that was on the verge of falling on me. Fearing that I wouldn't be able to make it to safety in time, I went back

into the lobby. I was in the revolving doors when a giant fireball from the jet fuel came towards me out of the elevator shaft, engulfing me in flames. I was blown 50 feet from the impact and landed in the street with a glass door on top of me. I went into shock, but managed to push the door off of me.

4. Severely burned and bleeding profusely from head and arm wounds, I staggered away, begging people to help me. I sat on the curb to rest and saw the second plane hit Tower Two. A young man jumped out of a taxi to help me. He decided that he would take me to a hospital in New Jersey to get away from the danger in the City. He helped me walk for the hour it took us to make it to the Hudson River and a ferry to New Jersey. Near the ferry, a fireman from a fireboat attempted to provide medical assistance, but my burns were too severe. We heard the rumbling as Tower Two began to fall and managed to escape on the last ferry, racing away before the debris cloud could engulf the boat.

5. As a result of the atrocities occurring in the World Trade Center on September 11, 2001, I suffered from head wounds and second and third degree burns on my face, head, neck, arms, and hands. I was in the hospital and trauma center for three weeks and underwent skin grafts to my hands and arms. I had a total of ten reconstructive surgeries on my hands and continue to suffer from intense nerve damage. After years of occupational therapy, I cannot close them into a full fist.

6. Since burns cause high blood sugar, I suffered, and continue to suffer from diabetes and its effects, including toe ulcers. After the attacks, I was put on insulin and I am still required to take it. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

7. September 11, 2001, and its carnage is emblazoned in my memory. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. I was surrounded by death, debris, burning, and smoke. I lost friends and co-workers. The situation could only be compared to a war zone.

8. I suffered, and continue to suffer, PTSD and severe emotional distress because of the World Trade Center terrorist attacks. My enjoyment of life has disintegrated as I suffered, and continue to suffer from depression, insomnia, anxiety, flashbacks, and nightmares.

9. I previously pursued a claim through the September 11th Victim Compensation Fund specifically related to my injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 27th day of December 2019.


KENNETH A. SUMMERS

Exhibits Filed Under Seal